

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION

DIANE MURPHY,

Plaintiff,

v.

NO. 1:05cv443-W
Demand for Jury Trial

ADVANCE AMERICA CASH
ADVANCE CENTERS OF ALABAMA,

Defendant.

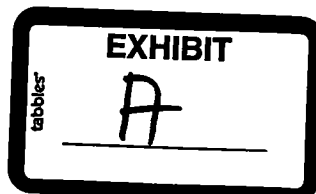
DEFENDANT'S FIRST SET OF INTERROGATORIES TO PLAINTIFF

Defendant, Advance America Cash Advance Centers of Alabama, requests that Plaintiff answer the following interrogatories separately and fully in writing and under oath within thirty (30) days from the date of service hereof, pursuant to Rule 33 of the Federal Rules of Civil Procedure.

INSTRUCTIONS AND DEFINITIONS

In answering these interrogatories, furnish all information available to Plaintiff, including information in the possession of Plaintiff's attorneys, investigators, and all persons acting on Plaintiff's behalf, and not merely such information known of Plaintiff's own personal knowledge. If Plaintiff cannot answer the interrogatories in full after exercising due diligence to secure the information, so state and answer to the extent possible, specifying Plaintiff's inability to answer the remainder and stating whatever information or knowledge Plaintiff has concerning the unanswered portions.

The interrogatories which follow are to be considered as continuing, and Plaintiff is requested to provide, by way of supplementary answers thereof, such additional information as Plaintiff or any



other person acting on Plaintiff's behalf may hereafter obtain which will augment or otherwise modify Plaintiff's answers now given to the interrogatories below. Such supplementary responses are to be filed and served upon Defendant within ten (10) days after receipt of such information, and in no case later than thirty (30) days prior to the date set for the pretrial conference for this case.

In each question wherein you are asked to "state the identity and location" of a person, state with respect to such person: (a) his/her name, (b) his/her last known home address and telephone number, (c) the name and address of his/her employer, and (d) his/her relationship to Plaintiff.

INTERROGATORIES

INTERROGATORY NO. 1:

State the identity and location of each and every person who Plaintiff believes may have discoverable information with respect to this action. For each such individual identified, describe what information Plaintiff believes said person has.

RESPONSE:

INTERROGATORY NO. 2:

State the identity and location of each person expected to be called as an expert witness at trial, the subject matter on which the expert is expected to testify, and the substance of the expert's testimony.

RESPONSE:

INTERROGATORY NO. 3:

State the name and address of all of Plaintiff's employers from December 29, 2004 to present.

RESPONSE:

INTERROGATORY NO. 4:

Set forth a computation of any category of damages claimed by Plaintiff in this action. For each such category of damages, state the nature and extent of injuries suffered and the monetary amount you are claiming, describing in detail how the amount you are seeking was calculated showing such calculations or formulas used to arrive at the number demanded.

RESPONSE:

INTERROGATORY NO. 5:

List all attempts by Plaintiff to secure employment since December 29, 2004, and for each employer with whom you sought employment, state:

- a. Name and address of employer;
- b. Method of inquiry (*e.g.*, application, resume, etc.);
- c. The date of inquiry;
- d. Position(s) sought;
- e. Whether or not you were offered employment;
- f. If you were not offered employment, what reason was given; and
- g. If you were offered but did not accept employment, why.

RESPONSE:

INTERROGATORY NO. 6:

State each and every period during which Plaintiff alleges that he/she was unable to seek, obtain or hold employment from December 29, 2004 to present. For each such period, if any, state the reason or reasons for any alleged inability to seek, obtain or hold employment.

RESPONSE:

INTERROGATORY NO. 7:

Itemize all income that you have received from any source since December 29, 2004.

RESPONSE:

INTERROGATORY NO. 8:

State the name, present home address and telephone number of all current or former employees of Defendant with whom Plaintiff has had contact of any sort since December 29, 2004 and provide the following:

- a. The date and location of each such contact;
- b. The person initiating each such contact;
- c. The substance of each such contact; and
- d. Whether each such contact was memorialized.

RESPONSE:

INTERROGATORY NO. 9:

State the identity and location of each and every person with whom Plaintiff has discussed the subject matter of this lawsuit, including:

- a. The date and location of each such discussion;
- b. The person initiating each such contact;
- c. The names of those present during the contact; and
- d. Whether each such discussion was memorialized.

RESPONSE:

INTERROGATORY NO. 10:

State the name, address and telephone number of each and every one of Plaintiff's employers since 1990 and provide the following:

- a. Date of employment;
- b. Position(s) held; and
- c. Reason(s) employment ended.

RESPONSE:

INTERROGATORY NO. 11:

Identify each and every charge or claim of discrimination filed by Plaintiff with any federal, state or local agency or entity and provide the following:

- a. The date that the charge was filed;
- b. The name of the agency(s) who received charge;

- c. The grounds for the charge; and
- d. The resolution of the charge.

RESPONSE:

INTERROGATORY NO. 12:

Please list the name, address and phone number of each and every physician, psychiatrist, psychologist, social worker or other medical mental health treatment provider that has rendered any form of treatment to Plaintiff for any condition alleged to be related to this lawsuit. For each such physician or other medical treatment provider, please state the date(s) treatment was rendered and the physician or other medical treatment provider's area of practice.

RESPONSE:

INTERROGATORY NO. 13:

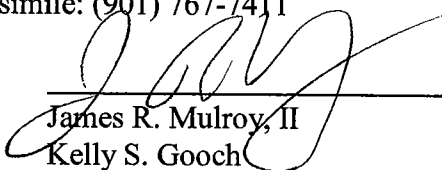
Please list the name of every type of medication taken by Plaintiff on a regular basis since January 1, 2004. For each medication identified, please state the date(s) when Plaintiff began taking the medication and, if applicable, the date(s) when Plaintiff stopped taking the medication; the frequency, intervals and dosage when Plaintiff takes or took the medication; the name of the health care provider who prescribed the medication, if applicable; and explain the reason(s) or purpose(s) for which Plaintiff takes or took the medication.

RESPONSE:

Respectfully submitted,

LEWIS FISHER HENDERSON
CLAXTON & MULROY, LLP
6410 Poplar Avenue, Suite 300
Memphis, Tennessee 38119
Telephone: (901) 767-6160
Facsimile: (901) 767-7411

By:



James R. Mulroy, II
Kelly S. Gooch

CERTIFICATE OF SERVICE

I hereby certify that I have this 2nd day of December, 2005 caused to be placed in the U.S. Mail, postage prepaid, a true and correct copy of the foregoing **DEFENDANT'S FIRST SET OF INTERROGATORIES TO PLAINTIFF** to:

Kenneth F. Gray, Jr., Esq.
Bret M. Gray, Esq.
Griffin & Associates
2100 River Haven Drive, Suite 1
Hoover, AL 35244

